

## Worksheet for Technical Review of Working Draft of Proposed Permit

<b>Company Name:</b>	Graphic Packaging International, Inc.	<b>AI #:</b>	39129	<b>TEMPO Activity No:</b>	PER20090001
<b>Facility Name:</b>	West Monroe Packaging Plant	<b>Remarks Submitted by:</b>	Bill Bruscino – Trinity Consultants		
<b>Permit Writer:</b>	Rusty J. Jack	<b>Permit Writer Email Address:</b>	<u>rusty.jack@la.gov</u>		

### Instructions

**Permit Reference** – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permit Briefing Sheet", etc.).

**Remarks** – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

**DEQ Response – DO NOT COMPLETE THIS SECTION.** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

<b>Permit Reference</b>	<b>Remarks</b>	<b>Air Permits Division Response</b> (for official use only)
Statement of Basis	On page 1 (line 5 in paragraph 1), please revise the sentence to "Except for the inks for the ink jet printer, which can be either water or <u>solvent</u> based."	The change has been made.

Permit Reference	Remarks	Air Permits Division Response (for official use only)															
Statement of Basis	On page 1 (line 8 in paragraph 1), please revise the facility SIC Code to <u>2657</u> .	The change has been made.															
Statement of Basis	On page 2 (line 6 in paragraph 4), please revise the sentence to "Therefore, for each line, VOC emissions from the inks and varnishes have been calculated as ..."	The change will not be made. The sentence proposed in the remark appears as stated in the statement of basis.															
Section III of Statement of Basis	Please revise the After and change rates under "Permitted Air Emissions" as follows:	The change will not be made. The totals in the "After" and "Change" columns in the proposed permit correctly show the facility-wide permitted totals and changes for the pollutants listed.															
	<table border="1" data-bbox="709 549 1019 1087"> <thead> <tr> <th>Pollutant</th><th>After</th><th>Change</th></tr> </thead> <tbody> <tr> <td>SO<sub>2</sub></td><td>0.12</td><td>-0.06</td></tr> <tr> <td>NO<sub>x</sub></td><td>20.24</td><td>-6.48</td></tr> <tr> <td>CO</td><td>17.00</td><td>-5.43</td></tr> <tr> <td>VOC</td><td>618.91</td><td>-186.20</td></tr> </tbody> </table>	Pollutant	After	Change	SO <sub>2</sub>	0.12	-0.06	NO <sub>x</sub>	20.24	-6.48	CO	17.00	-5.43	VOC	618.91	-186.20	The change has been made.
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VOC	618.91	-186.20															
Section IV of Statement of Basis	In the "Applicability and Exemptions of Selected Subject Items" table, in the 3 <sup>rd</sup> row, please delete EQT 09, as this source is decommissioned in this permit renewal.	The change has been made.															
Section IV of Statement of Basis	In the "Applicability and Exemptions of Selected Subject Items" table, in the 5 <sup>th</sup> row, please delete FUG 05, as this source is decommissioned in this permit renewal.	The change has been made.															
Signature page of the Permit	On the signature page of the permit, Permit No. is listed as 2160-00008-V2. Please revise this to 2160-00008-V3.	The change has been made.															
Section III, Air Permit Briefing Sheet	On page 1 (line 4 in paragraph 1), please revise the sentence to "Except for the inks for the ink jet printer, which can be either water or solvent based..."	The change has been made.															

Permit Reference	Remarks	Air Permits Division Response (for official use only)															
Section III, Air Permit Briefing Sheet	On page 1 (line 7 in paragraph 1), please revise the facility SIC Code to <u>2657</u> .	The change has been made.															
Section III, Air Permit Briefing Sheet	On page 2 (line 6 in paragraph 4), please revise the sentence to "Therefore, for each line, VOC emissions from the inks and varnishes have been calculated as ..."	The change will not be made. The sentence proposed in the remark appears as stated in the air permit briefing sheet.															
Section III, Air Permit Briefing Sheet	On page 4, please revise the After and change rates under "Estimated emissions in tons per year" table as follows:	The change will not be made. The totals in the "After" and "Change" columns in the proposed permit correctly show the facility-wide permitted totals and changes for the pollutants listed.															
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VOC	618.91	-186.20															
Section X, Applicable Louisiana and Federal Air Quality Requirements	Please add requirement '1' under LAC 33:III.Chapter 11 and 13 for UNF 001. Also, please add requirement "3" under 40 CFR 64 for UNF 001.	The changes have been made.															
Section X, Applicable Louisiana and Federal Air Quality Requirements	Please add columns for 40 CFR 70 and 40 CFR 82 in the table and add a requirement '1' for UNF 001.	Adding a column for 40 CFR 70 has been determined unnecessary because all Title V facilities must comply with Part 70 of the Code of Federal Regulations. A column has been added for 40 CFR 82 with a "1" under UNF 001 denoting the part's applicability.															
Section X, Applicable Louisiana and Federal Air Quality Requirements	Please add requirement '1' under LAC 33:III.Chapter 13 and 40 CFR 63 Subpart KK for EQT 008.	The changes have been made.															
Section X, Applicable Louisiana and Federal Air Quality Requirements	Please add requirement '3' under 40 CFR 63 Subpart KK for EQT 014.	The change has been made.															

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Section X. Applicable Louisiana and Federal Air Quality Requirements	Please add a requirement '1' under LAC 33:III, Chapter 5 and 40 CFR 52 for EQT 015, EQT 017, FUG 010, and FUG 012.	A "509" column has been added to indicate PSD applicability and a "1" has been added under 40 CFR 52 as requested.
Section XI. Explanation for Exemption Status or Non-Applicability of a Source	Please add the following non-applicability for UNF 001:	The change has been made.
	"Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64] - DOES NOT APPLY. No emission points at the plant meet the criteria for CAP applicability (i.e. subject to emission limitation, use of control device to achieve compliance, and has potential pre-control device emissions greater than major source threshold)."	
Section XI. Explanation for Exemption Status or Non-Applicability of a Source	In the 3 <sup>rd</sup> row, please delete EQT 009, as this source is decommissioned in this permit renewal.	The change has been made.
Section XI. Explanation for Exemption Status or Non-Applicability of a Source	In the 5 <sup>th</sup> row, please delete FUG 005, as this source is decommissioned in this permit renewal.	The change has been made.
Section XI. Explanation for Exemption Status or Non-Applicability of a Source	Please add the following non-applicability for EQT 014:	The change has been made.
	"National Emission Standards for the Printing and Publishing Industry [40 CFR 63, Subpart KK] - DOES NOT APPLY. Source does not meet the definition of an affected source under Subpart KK."	
General Information		
	Coordinated for the location of the Front Gate provided in this section represents the location specified in the 2160-00008-V2 permit in 'NAD27 Coordinate Datum.' Please revise the coordinates or the coordinate datum as required.	The coordinates have been converted to the NAD83 coordinate datum.
Emission Rates for Criteria Pollutants	Please revise the SO <sub>2</sub> average emissions for EQT 004 from <0.01 lb/hr to <u>0.005 lb/hr</u> .	The emission rate has been revised to 0.01 lb/h for consistency with LDEQ policy.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Emission Rates for Criteria Pollutants	Please revise the SO <sub>2</sub> average emissions for EQT 006 from <0.01 lb/hr to <u>0.004 lb/hr</u> .	The change will not be made. In accordance with LDEQ policy, hourly mass rates for criteria pollutants are rounded to two decimal places.
Emission Rates for Criteria Pollutants	Please revise the SO <sub>2</sub> average emissions for EQT 007 from <0.01 lb/hr to <u>0.004 lb/hr</u> and maximum emissions from <0.01 lb/hr to <u>0.005 lb/hr</u> .	The change to the average emission will not be made (see the similar note above). The maximum emissions have been rounded to 0.01 lb/hr.
Emission Rates for Criteria Pollutants	Please revise the SO <sub>2</sub> average emissions for EQT 013 from <0.01 lb/hr to <u>0.002 lb/hr</u> and maximum emissions from <0.01 lb/hr to <u>0.002 lb/hr</u> .	The changes will not be made. See the similar explanation above.
Emission Rates for Criteria Pollutants	Please revise the SO <sub>2</sub> average emissions for EQT 015 from <0.01 lb/hr to <u>0.01 lb/hr</u> .	The change has been made.
Emission Rates for Criteria Pollutants	Please revise the SO <sub>2</sub> average emissions for EQT 017 from <0.01 lb/hr to <u>0.01 lb/hr</u> .	The change has been made.
Emission Rates for TAP/HAP & Other Pollutants	Please revise the average and maximum ethylene glycol emissions from <0.01 lb/hr to <u>&lt;0.001 lb/hr</u> for the following sources: EQT 004, EQT 006, EQT 007, EQT 015, EQT 017, FUG 001, FUG 003, FUG 004, FUG 010, and FUG 012.	The changes have been made.
Emission Rates for TAP/HAP & Other Pollutants	Please revise the average and maximum ethylene glycol emissions from <0.01 lb/hr to <u>&lt;0.001 lb/hr</u> for FUG 009.	The change has been made.
Emission Rates for TAP/HAP & Other Pollutants	Please revise the average and maximum emission rated for Diethanolamine for EQT 013 from <0.01 lb/hr to <u>0.001 lb/hr</u> .	The change has been made.
Emission Rates for TAP/HAP & Other Pollutants	Please delete the extra line containing the average and maximum hourly emission rates of < 0.01 lb/hr, listed for ethylene glycol for EQT 013.	The change has been made.
Emission Rates for TAP/HAP & Other Pollutants	Please revise the average emissions for styrene for FUG 003 from 0.04 lb/hr to <u>0.03 lb/hr</u> .	The change has been made.

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Inventories - Subject Item Inventory	Please revise the normal operating rate for EQT 011 from <u>1.76 MM ft^3/hr</u> to <u>2.082 MM ft^3/hr</u> .	The change has been made.
Inventories - Subject Item Inventory	Please add " <u>Natural gas fired</u> " under contents for EQT 017.	The change has been made.
Inventories - Stack Information	Please revise the temperature for EQT 004 and EQT 006 from <u>150 °F</u> to <u>170 °F</u> .	The changes have been made.
Inventories - Stack Information	Please revise the following stack parameters for EQT 007:	The changes have been made.
	<ul style="list-style-type: none"> <li>• Temperature from <u>150 °F</u> to <u>170 °F</u>; and</li> <li>• Height from <u>45 ft</u> <u>42 ft</u>.</li> </ul>	
Inventories - Stack Information	Please revise the flow rate for EQT 011 from <u>29,400 ft³/min</u> actual to <u>34,700 ft³/min-actual</u> .	The changes have been made.
Inventories - Stack Information	Please add the following stack parameters to EQT 015:	The changes have been made.
	<ul style="list-style-type: none"> <li>• Diameter - <u>3.16 ft</u>; and</li> <li>• Height - <u>39.5 ft</u>.</li> </ul>	
Inventories - Stack Information	Please add the source EQT 017 to the table and add the following stack parameters:	The changes have been made.
	<ul style="list-style-type: none"> <li>• Velocity - <u>8.96 ft/sec</u>;</li> <li>• Flow rate - <u>675 ft³/min-actual</u>;</li> <li>• Diameter - <u>4 ft</u>;</li> <li>• Height - <u>31.5 ft</u>; and</li> <li>• Temperature - <u>180 °F</u>.</li> </ul>	
Inventories - Annual Maintenance Fee	Please delete the line for Fee Number 0410, as the facility does not fall under SIC code 2752.	The change has been made.
Inventories - Annual Maintenance Fee	Please update the number under 'Multiplier' to <u>'6'</u> and the 'Units of Measure' to <u>'Presses'</u> for Fee Number 0375.	The change has been made to the multiplier. The units of measure are a non-editable feature in the TEMPO system.
Specific Requirements	Please delete the sentence at the end of the Specific Requirement Nos. 5, 7, 9, 12, 19, and 25 that says: "Complies by using sweet natural gas as fuel."	The change will not be made. The requirements are for sources that use sweet natural gas as fuel.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements	Please add the LAC 33:III.Chapter 15 record keeping requirements for EQT 004, EQT 006, EQT 007, EQT 013, EQT 015, and EQT 017	The change will not be made. These sources are not subject to LAC 33:III. Chapter 15 in any way as they emit less than 5 tons/year of SO <sub>2</sub> .
Specific Requirements	Please add the LAC 33:III.1103 requirement for EQT 004, EQT 006, EQT 007, and EQT 013.	The change will not be made. LAC 33:III.1103 is included as a facility-wide requirement for all sources that have the potential to emit smoke.
Specific Requirements	Please add the LAC 33:III.1311.C requirement under EQT 011.	The change has been made.
Specific Requirements	Please delete the Specific Requirement No. 14, as 40 CFR 63 Subpart KK does not apply to this source as this does not meet the affected source definition under Subpart KK.	The change has been made.
Specific Requirements	Please add 40 CFR 63 Subpart KK Alternative Requirement [40 CFR 63.825(b)(3)(i)] for EQT 017 as specified in the Title V Renewal Application submitted to the LDEQ on March 17, 2009.	The change has been made.
Specific Requirements	Please add 40 CFR 63 Subpart KK Requirement [40 CFR 63.825(b)(3)(i)] for FUG 010 as specified in the Title V Renewal Application submitted to the LDEQ on March 17, 2009.	The change has been made.
Specific Requirements	Please add 40 CFR 63 Subpart KK Alternative Requirement [40 CFR 63.825(b)(3)(i)] for FUG 012 as specified in the Title V Renewal Application submitted to the LDEQ on March 17, 2009.	The change has been made.
Specific Requirements	Please revise the citation for the Specific Requirement Nos. 38 and 40 from LAC 33:III.2143.A.1 to <u>LAC 33:III.2143.C.</u>	The changes have been made.
Specific Requirements	Please revise the citation for Specific Requirement No. 43 from 40 CFR 63.825(b)(1) to <u>40 CFR 63.825(b)(3)(i)</u> .	The change will not be made. The citation is correct as it appears in the requirement.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements	Please revise the language in the Specific Requirement No. 60 to "Do not cause a violation of any ambient air standard listed in LAC 33:III.5112 Table 51.2, unless operating in accordance with LAC 33:III.5109.B.	The change has been made.
Specific Requirements	Please delete Specific Requirement Nos. 71 and 72, as there are no new sources proposed in this permit.	The change has been made.